

JUDGE CARTER**25 CV 01008**RECEIVED
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2025 FEB -4 PM 4:03UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Tiffany Anne Parkes,

Plaintiff,

Index No.

- against -

COMPLAINTBrianna Colbert
Erin Cunningham
Shanika Hillocks
Ebony John
Kimberly Spoerri-Kelley
Cosmo Whyte

Plaintiff does not request a jury trial.

Defendants.

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TO THE UNITED STATES DISTRICT COURT IN THE SOUTHERN DISTRICT OF NEW YORK

The complaint of the plaintiff, Tiffany Anne Parkes, respectfully shows and alleges as follows:

I&II. The basis for federal-court jurisdiction in this case is Federal Question and Diversity of Citizenship.

A. The following federal constitutional or federal statutory rights have been violated:

Amendment IV of the U.S. Constitution, 18 U.S.C. § 114, 18 U.S.C. § 351(e), 18 U.S.C. § 1519, 18 U.S.C. § 371

B. The plaintiff, Tiffany Anne Parkes, is a citizen of the State of New York. Ms. Parkes resides at 353 3rd Avenue PMB #114, New York, NY 10010. She may be contacted via cell phone at (917) 572-1107, and her e-mail address is parkes.tiffany.a@gmail.com.

The defendant, Brianna Colbert, is a citizen of the state of Texas. Ms. Colbert resides at 3118 Forestbrook Dr, Spring, TX 77373 as well as 12887 Triton Ln, Victorville, CA 92392. She has a principal place of business at 1309 E Main St Barstow, CA 92311. She may be contacted via cell phone at (760)881-7821, and

her e-mail address is Brianna aka cutie@yahoo.com.

The defendant, Erin Cunningham, is a citizen of the state of New Jersey. Ms. Cunningham resides at 832 P.O. Box Cliffside Park, NJ 07010. She has a principal place of business at 225 Walker St Unit 302 Cliffside Park, NJ 07010. She may be contacted via phone at (917)569-6795, and her e-mail address is misserinbelle1@yahoo.com or erin.cunningham@msn.com.

The defendant, Shanika Hillocks, is a citizen of the state of New York. Ms. Hillocks resides at 767 Saint Nicholas Avenue #3R New York, NY 10031 or 130 Sullivan Place, Brooklyn, NY 11225. She may be contacted at Shanika@shanikahillocks.com.

The defendant, Ebony John, is a citizen of the state of New York. Ms. John resides at 1563 Sterling Place Brooklyn, NY 11213. She may be contacted via cell phone at (917) 640-3726, and her e-mail address is ebonyjohn12@gmail.com.

The defendant, Kimberly Spoerri-Kelley, J.D., is a citizen of the State of New Jersey. Ms. Spoerri-Kelley resides at 937 Bloomfield St Hoboken, NJ 07030. She has a principal place of business at One Liberty Plaza, 1 Liberty Pl New York, NY 10006. She may be contacted via cell phone at (917)251-1030, and her e-mail address is kspoerri@cgsh.com.

The defendant, Cosmo Whyte, is a citizen of the State of California. Mr. Whyte resides at 4810 S La Brea Ave Apt. 305 Los Angeles, CA 90008 and 111 Crowell St Hempstead, NY 11550. He has a principal place of business at UCLA School of The Arts and Architecture 240 Charles E. Young Dr N, Broad Art Center Ste 2275 Los Angeles, CA 90095 as well as Anat Ebgi Gallery 4859 Fountain Avenue Los Angeles, CA 90029. He may be contacted via phone at (310) 825-3281, and his email address is Cosmo.whyte@arts.ucla.edu.

III. In early November 2017, the plaintiff was suddenly diagnosed with sciatica. The examining doctor remarked that this was odd considering the plaintiff's age and the fact that the plaintiff had not been pregnant. The sciatica subsided in November 2017 and had not reappeared again until briefly in Summer 2022 (following a tattoo session) and then in November/December 2022, October/November 2023 - June 2024. The repetitious onset of sciatica in October/November as well as the plaintiff's exposure to chemical/biological agents while living at 158 E 126th Street in New York, NY and 3420 Toledo Terrace in Hyattsville, MD that triggered the same sciatic pain suggests that the condition was engineered and not naturally occurring. Additionally, the initial onset in November 2017 was immediately following the plaintiff's first acquaintance with Lester Walker. Similar to the below noted occurrences involving Ebony John, these events are not coincidental. In December 2017/January 2018, intimate moments shared between the plaintiff and her then beau - Cosmo Whyte - were recorded without the plaintiff's knowledge and therefore without her consent. The plaintiff heard a recording of one of these moments, which had been a Skype meeting between the plaintiff and Mr. Whyte, playing loudly from a complete stranger's car speakers as that stranger watched the moment on a screen in his vehicle on May 26th, 2024 in Washington, DC. On May 10, 2019, the plaintiff's White, BMW X6 was vandalized. The following day, Ebony John expressed conflicting emotions via her Instagram Stories that alluded to her involvement in said vandalization. In the following months, the plaintiff experienced targeting of her vehicle for ticketing and towing. Then, on May 18, 2019, the plaintiff was drugged "date raped". See police complaint report 7548. The plaintiff was harassed via social media beginning March/April 2019. The harassment via social media became more aggressive and incessant between the months of June and September 2019. Then, on August 30/31st, 2019, the plaintiff was intimate with a male interest. This activity, which was assumed by the plaintiff to be private, has been broadcasted to complete strangers. This broadcasting has deeply affected the plaintiff's professional as well as personal life. The plaintiff experienced blatant sexual harassment at her place of employment - Harlem Village Academies High School - in October 2019. The plaintiff has record of this occurrence. The plaintiff began briefly dating a male co-worker Mid October 2019 - early December 2019; it is reasonable to conclude that the plaintiff's interactions with this man were also recorded/broadcasted. All of the text conversations with this man have been conveniently deleted from the plaintiff's cellular devices; he has disappeared from all social media and has no online presence. His father is also NYPD. It should be noted that this male co-worker was fired for inappropriately

interacting with a female student; he had engaged in similar behavior at a former place of employment and allegedly was terminated from his place of employment following his termination from HVA for inappropriate, sexual behavior. It is also important to note that this same male co-worker attempted to engage with the plaintiff intimately following the end of their dating, and the plaintiff rejected his advances and altogether avoided him. In hindsight, much of the conversation that was occurring between the plaintiff's co-workers at HVA was hinting at their knowledge of the intimate moment the plaintiff had experienced in August 2019; however, at that time, the plaintiff had not been made aware of the fact that the interaction had been made public, so she did not catch their hints or understand how they could have been privy to such information. The plaintiff was also led to believe that she was "crazy" and was told to stop trying to figure out what was going on by her "best friend". The plaintiff is aware of said broadcasting/recording now and has been since Spring/Summer 2023. The effects of this harassment and abuse have been long lasting, as they are still apparent. The plaintiff did not functionally recover from the 2019 harassment until Mid to late February 2020 and has since been further permanently injured. Ebony John, Erin Cunningham, Brianna Colbert, and Cosmo Whyte are to be held responsible for the recording/broadcasting of the plaintiff's personal life. Ebony John and Erin Cunningham are also to be held responsible for attempting to sabotage the plaintiff's employment in 2019, 2023, and 2024-2025. The attempt in 2023 was successful and was aided by Shanika Hillocks and Kimberly Spoerri-Kelley. The attempt in 2024-2025 was also successful.

For the purposes of this case, the planning and recording of the above mentioned intimate interactions will be referred to as a quasi-train, elevated new school gang activity as all of the named defendants are gang members. One defendant - Brianna Colbert - is particularly vocal about her membership within Blood gang, Piru set. She has even made it a point to post video of her shooting a loaded gun on Instagram, religiously wear red bandanas, and throw up sets in photographs. These women and man, all federal agents/law enforcement, operate under a code of silence/secretcy called Omerta, the origins of which are Italian and La Cosa Nostra/Mafia appropriate. The re-appropriation of such a code to be enacted when perpetrators of senseless, unwarranted violence, trafficking, or other abuses want protection (which is laughable that the villains are playing victims) is foolish for people of color in The United States of America as they are not protected by the governing authorities as White people are. Therefore, when senseless, unwarranted violence is perpetrated against innocent people of color by guilty people of color within these organizations there is no protection for members of said organizations that are supposed to protect their own. There is overarching protection for White people who also happen to be members of such organizations. This code is

upheld and reinforced by government institutions such as the FBI and C.I.A. who command silence and work under anonymity while conducting investigations.

The plaintiff has been harassed by Shanika Hillocks, whom she met for the first time in October 2020 following an introduction via telephone in July 2020, since September/October 2021.

The plaintiff was employed by Soho House & Co. April 11, 2022 - February 14, 2023. Shanika Hillocks was granted membership at the private club not even one month after the plaintiff had begun working for the company and she had several points of contact within the company (including a Membership Manager who was integral to NYC house operations) as well as many friends amongst the club's members who frequented the DUMBO House location. With this internal access to management and membership as well as her position as a member of law enforcement agencies, Shanika Hillocks was involved in the orchestration of events presented in case 1:24-cv-3821. The plaintiff attempted to file a police report on April 20th, 2024 detailing Shanika Hillocks' harassment of the plaintiff that began in September/October 2021 and has continued; officers at two separate precincts - the 10th and the 6th - refused to file a report even when presented with evidence. The plaintiff also contacted and filed a complaint with the Manhattan District Attorney's Office regarding said harassment, obstruction of justice, and falsification of police reports. Complaints were also filed with the CCRB and the NYPD's IAB.

On October 4, 2022, Louise Messinga the Soho House member under whose profile Ebony John attended the private club, was granted membership. This was immediately following the plaintiff's first opportunity to work with DUMBO House's kitchen at the request of the General Manager and Head Chef and with the encouragement of Food & Beverage Managers. On November 18, 2022, Ebony John had a profile created in Soho House's database; this was not even twenty-four hours after the plaintiff was reacquainted with Lester Walker and spent a night at his home. On December 30, 2022, Ebony John showed up to the plaintiff's place of employment for the first and only time while the plaintiff was actively employed by Soho House & Co. This was immediately following a brief text exchange between Lester Walker and the plaintiff. The repeated closeness and immediacy of these occurrences is not coincidental especially when considered in conjunction with the past and present harassment and assault perpetuated by Ebony John toward/upon the plaintiff. Also considering Ms. John's position as a member of law enforcement

agencies, it is sensible to conclude that Ebony John was involved in the orchestration of events presented in case 1:24-cv-3821.

The plaintiff attempted to file a police report with the Yonkers Police Department in September 2024 regarding a sexual assault that had occurred in Mr. Walker's apartment at the fault of Ebony John and others on August 30/31, 2019; the two male officers refused to file a report, provided the plaintiff with a reference number, and stated they would look into the incident and be in contact with the plaintiff. The plaintiff has heard nothing from the officers since.

The plaintiff resided at 601 W 141st Street from July 2019 until January 2020. While living at this address, the plaintiff was subjected to psychological and technological warfare.

The plaintiff resided at 231 Malcolm X Blvd from January 2020 until December 2020. While living at this address, the plaintiff was subjected to chemical/biological warfare.

The plaintiff resided at 158 E 126th Street from January 2021 until March 2023. While living at this address, the plaintiff was subjected to chemical/biological and technological warfare.

The plaintiff resided at 3420 Toledo Terrace in Hyattsville, MD from March 2023 until June 2024. While living at this address, the plaintiff was subject to psychological, chemical, biological, and technological warfare. The plaintiff has detailed documentation of said warfare/abuse. As all of this activity has been broadcasted, there has been an assault on the plaintiff's character and body - particularly the plaintiff's brain.

In March 2021, the plaintiff's mother suddenly died; the mother's death followed years of psychological abuse, biological warfare, chemical warfare, and harassment from federal agents and gang members. The plaintiff was not allowed to see her mother's body any time after discovery or prior to burial. Not coincidentally, the abuse of the mother mirrors that of her daughter, the plaintiff. As well, the mother's body was kept at the medical examiner's office for an unusually long amount of time, which is a cause for concern and speculation. The death certificate omits pertinent information regarding the nature and determination of the cause of the plaintiff's mother's death, which is a cause for concern and speculation. Kimberly Spoerri-Kelley and Shanika Hillocks are partially responsible for this death/murder and abuse. Brianna

Colbert, Cosmo Whyte, Ebony John, Erin Cunningham are to be strong suspects in the plaintiff's mother's death/murder. Due to the circumstances leading up to and surrounding the plaintiff's mother's death, the plaintiff has probable cause to open an investigation into foul play.

The motives for said warfare are tied to investigations that have been fueled by actions and indiscretions of the plaintiff's father and maternal uncle who happens to be the biological father of Shanika Hillocks. The plaintiff filed a report with the FBI in NYC regarding said indiscretions in July 2024.

The following cases have been filed and are related to this case:

1:24-cv-3821

1:24-cv-02374

1:24-cv-08099

1:25-cv-00074

1:25-cv-00075

See the following police reports that have been filed and are related to this case:

2023-025-000977

2024-067-008582

2024-073-009998

2024-013-007321

2024-013-008412

2024-067-007548

A Standard Form SF-95 has been filed with the C.I.A and FBI as the defendants are agents of said government agencies. A Standard Form SF-95 for DHS is forthcoming.

Several police reports have been filed and all have been falsified or dismissed (not investigated) by NYPD officers because the defendants are federal agents/law enforcement, working directly for/with NYPD. It is important to state that the defendants have conspired to commit the crimes outlined in the noted police reports, Standard Form SF-95s, and filed suits.

As a result of the events documented in case 1:24-cv-08099, the plaintiff has been left with a large, deep, two-pronged scar across the entire center of her uterus. The plaintiff is a woman who would like to experience the process of pregnancy and childbirth, and this discovery is certainly a complicating factor as has been the broadcasting of the plaintiff's personal life/intimacies. Shanika Hillocks, Kimberly Spoerri-Kelley, and Ebony John are to be held responsible for the permanent damage that has been done to the plaintiff's uterus, other likely suspects pending.

By reason of the facts and circumstances stated above, the plaintiff asks that the court order compensation in the amount of \$600,000,000.00 to cover punitive damages, pain and suffering, and medical expenses.

Dated: February 4, 2025



Tiffany Anne Parkes
Plaintiff
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